

1 Michael Paretti  
Nevada Bar No. 13926  
2 SNELL & WILMER L.L.P.  
3883 Howard Hughes Parkway, Suite 1100  
3 Las Vegas, NV 89169  
Telephone: (702) 784-5200  
4 Facsimile: (702) 784-5252  
Email: mparetti@swlaw.com

5 Attorneys for Defendant  
6 Credit One Bank, N.A.

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 SUZETTE SECONDI,

11 Plaintiff,

12 vs.

13 CREDIT ONE BANK, N.A.,

14 Defendant.

CASE NO.: 2:20-cv-00188-KJD-VCF

**STIPULATION AND ORDER FOR  
EXTENSION TO RESPOND TO  
COMPLAINT**

**(FIRST REQUEST)**

15  
16 Plaintiff Suzette Secondi (“Plaintiff”) and Defendant Credit One Bank, N.A. (“Credit  
17 One”) (collectively, the “Parties”), by and through their undersigned counsel, for good cause  
18 shown, hereby stipulate and agree to extend Credit One’s deadline to respond to Plaintiff’s  
19 Complaint [ECF No. 1] to March 6, 2020, for the following reasons:

- 20 1. Plaintiff served the Complaint and Summons on Credit One on January 31, 2020.
- 21 2. Credit One’s Answer is currently due February 21, 2020.
- 22 3. Credit One requires additional time to investigate the allegations set forth in the  
23 Complaint and to prepare the appropriate response.
- 24 4. On February 14, 2020, counsel for Plaintiff agreed to the extension requested  
25 herein.
- 26 5. This extension request is sought in good faith and is not made for the purpose of  
27 delay.
- 28

1 Therefore, the Parties respectfully request an extension for Credit One to respond to  
2 Plaintiff's Complaint to and including March 6, 2020.

3  
4 DATED: February 17, 2020

DATED: February 17, 2020

5 PRICE LAW GROUP, APC

SNELL & WILMER L.L.P.

6 By: /s/ Steven A. Alpert

By: /s/ Michael Paretti

7 Steven A. Alpert  
8 Nevada Bar No. 8353  
5940 S. Rainbow Blvd., Suite 3014  
Las Vegas, Nevada 89118

Michael Paretti  
Nevada Bar No. 13926  
3883 Howard Hughes Parkway  
Suite 1100  
Las Vegas, Nevada 89169

9 *Attorneys for Plaintiff Suzette Secondi*

*Attorneys for Defendant Credit One Bank,  
N.A.*

10  
11  
12 **ORDER**

13 **IT IS ORDERED** that Credit One shall respond to Plaintiff's Complaint on or before  
14 March 6, 2020.

15 DATED: February 18, 2020.

16  
17 

18 UNITED STATES MAGISTRATE JUDGE  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER FOR EXTENSION TO RESPOND TO COMPLAINT** by the method indicated:



**BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

DATED this 17th day of February, 2020.

/s/ Maricris Williams  
An Employee of Snell & Wilmer L.L.P.

4848-2287-3780.1